REMARKS/ARGUMENTS

Applicants appreciate the thorough examination of the present application, as evidenced by the first Official Action. The Official Action rejects all of the pending claims of the present application, namely Claims 28-66, under the judicially-created doctrine of double patenting in view of U.S. Patent No. 6,636,877 to Doleac et al. The Official Action also rejects Claims 28-30, 32, 36-39, 41, 45-48, 50 and 54-66 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 4,599,490 to Cornell et al., in view of U.S. Patent No. 6,230,164 to Rekieta et al. Applicants note with appreciation the indication that the remaining claims, namely Claims 31, 33-35, 40, 42-44, 49 and 51-53 are allowable.

In response to the Official Action, Applicants have submitted herewith a terminal disclaimer to address the obviousness-type double patenting rejection of Claims 28-66. Thus, Applicants respectfully submit that the double patenting rejection of Claims 28-66 is overcome. As explained below, however, Applicants respectfully submit that the claimed invention is patentably distinct from Cornell and Rekieta, taken individually or in combination. Thus, Applicants respectfully traverse the rejections of various ones of the claims of the present application as being unpatentable over Cornell in view of Rekieta. In view of the terminal disclaimer and the remarks presented herein, Applicants respectfully request reconsideration and allowance of all of the pending claims of the present application.

A. *Claims 28-54 are Patentable*

Independent Claim 28 recites a method executed in a computer system of verifying generated commands. As recited, the method includes providing first switch commands generated by a first system, and generating a subset of the first switch commands. The method also includes providing data used by a second system to generate second switch commands, and determining whether the data used by the second system corresponds to first switch commands included in the subset. In this regard, correspondence between the data and the first switch commands is indicative of the second system being capable of generating at least one second switch command equivalent to a first switch command included in the subset.

As conceded by the first Official Action, Cornell does not teach or suggest <u>determining</u>
<u>whether data used by a second system corresponds to first switch commands included in a subset</u>
<u>of such commands, where correspondence is indicative of the second system being capable of</u>
<u>generating second switch command(s) equivalent to a first switch command included in the</u>
<u>subset</u>. Nonetheless, the Official Action alleges that Rekieta discloses this feature and that one
skilled in the art would have been motivated to modify Cornell to include the feature to thereby
teach the claimed invention. As motivation, the Official Action alleges that the modification
"would allow the teachings of Cornell to improve the accuracy and the reliability of the method
for analyzing the quality of telecommunications switch command tables, and to provide an
efficient system for modifying the GTTs associated with various subsystems in the AIN," citing
column 17, lines 54-55 of Rekieta. Applicants respectfully disagree.

Rekieta discloses a communication system with rapid database synchronization. As
disclosed, an Advanced Intelligent Network (AIN) service includes multiple Service Control
Point (SCP) pairs for maintaining a subscriber database storing information about the accounts of
a number of network subscribers. The SCP pairs are expandable to account for increases in the
number of subscribers (and thus, the number of subscriber records), and can expand by migrating
records between SCP pairs while maintaining redundancy between the pairs. A Centralized
Global Title Table (CGTT) maintains Global Title Tables (GTTs) distributed between multiple
subsystems in the AIN system. Mate SCPs within a pair are fully redundant (i.e., have an
identical database), subject to short-term variations that are resolved by a synchronization
process that occurs at high speed as the subscriber database is split into multiple files, each file
having a separate synchronization process.

Rekieta therefore discloses providing variable pairs of SCPs for storing records of a
subscriber database, where the SCPs of a pair are redundant and the number of pairs of SCPs
increase to account for an increase in the number of records. However, Rekieta does not teach or
suggest any determination as to whether data used by any SCP of a pair of SCPs, any pair of
SCPs, or any other element (used to generate second switch commands) corresponds to first
switch commands included in a subset of first switch commands (generated by a SCP, pair of
SCPs or any other element), as recited by independent Claim 28. And more particularly, Rekieta

does not teach or suggest any determination step that is indicative of the respective SCP or pair of SCPs being capable of generating second switch command(s) equivalent to a first switch command in the subset, as also recited by independent Claim 28. Rekieta does disclose synchronizing customer records between mate SCPs of a pair of SCPs, as well as migrating customer records from one pair of SCPs to another, added pair of SCPs to account for increasing number of subscriber records. In neither instance, however, is any determination made as to whether data used by an SCP (i.e., customer record) to generate a second switch command corresponds to a first switch commands included in a subset of first switch commands, particularly since the data synchronized between mate SCPs or migrated from one pair of SCPs to another are customer records, and not switch commands. Moreover, even if an SCP did perform a determination step, no SCP performs a determination indicative of the respective SCP being capable of generating second switch command(s) equivalent to a first switch command in the subset.

Applicants therefore respectfully submit that neither Cornell nor Rekieta, taken individually or in combination, teach or suggest at least the determining step of independent Claim 28. Thus, Applicants respectfully submit that independent Claim 28, and by dependency Claims 29-36, are patentably distinct from Cornell and Rekieta, taken individually or in combination. Applicants also respectfully submit that independent Claims 37 and 46 recite subject matter similar to that of independent Claim 28, including the aforementioned feature of determining correspondence between data used by a second system to generate second switch commands, and first switch commands of a subset of such commands. Accordingly, Applicants also respectfully submit that independent Claims 37 and 46, and by dependency Claims 38-45 and 47-54, are also patentably distinct from Cornell and Rekieta, taken individually or in combination, for at least the reasons given above with respect to independent Claim 28.

For at least the foregoing reasons, Applicants respectfully submit that the rejection of Claims 28-30, 32, 36-39, 41, 45-48, 50 and 54 under 35 U.S.C. § 103(a) as being unpatentable over Cornell in view of Rekieta is overcome.

B.   Claims 55-66 are Patentable

Independent Claim 55 recites a method of verifying switch commands for a telecommunications network. As recited, the method includes obtaining, from a first system, first executable switch commands for a telecommunications network. The method also includes providing data used by a second system to generate second executable switch commands for the telecommunications network, and comparing the first executable switch commands with the data used by the second system. Further, the method includes identifying, based on a match between a first executable switch command and the data used by the second system, the matched first executable switch command as being coded by data used by the second system to generate a second executable switch command for the telecommunications network.

In contrast to the method of independent Claim 55, and as explained below, neither Cornell nor Rekieta, taken individually or in combination, teach or suggest either of the aforementioned comparing or identifying steps.

1.   Comparing First Executable Switch Commands

As indicated above, neither Cornell nor Rekieta, taken individually or in combination, teach or suggest <u>comparing first executable switch commands with data used by a second system to generate second executable switch commands,</u> as recited by independent Claim 55. The Official Action cites Cornell, and particularly column 23, lines 59-65 of Cornell, as disclosing this feature of the claimed invention. In the aforementioned cited passage, as well as column 17, line 51 to column 18, line 10, Cornell discloses providing two or more telecommunication switches to a mobile telecommunication controller and associated cell sites to reduce the average length of communication links by allowing cell cites to connect to the closer of the provided switches. Even if one argued that two provided telecommunication switches correspond to first and second systems, nowhere does Cornell teach or suggest comparing the switch commands of one of the switches with data used by the other switch to generate switch commands, similar to the comparing step of the claimed invention. And more particularly, given the Official Action interpreting primitive commands generated by a telecommunication switch controller as corresponding to first executable switch commands (taking this interpretation as given, although

expressly not conceding the point), nowhere does Cornell teach or suggest comparing the primitive commands of one telecommunication switch with data used by the other telecommunication switch to generate primitive commands.

2. *Identifying a Matched First Executable Switch Command*

As also indicated above, neither Cornell nor Rekieta, taken individually or in combination, teach or suggest <u>identifying, based on a match between a first executable switch command and the data used by the second system, the matched first executable switch command as being coded by data used by the second system to generate a second executable switch command for the telecommunications network,</u> as recited by independent Claim 55. In fact, the Official Action concedes that Cornell does not teach or suggest this feature of the claimed invention. Nonetheless, the Official Action alleges that Rekieta discloses this feature, and that it would have been obvious to one skilled in the art to modify Cornell to include the feature to thereby teach the claimed invention. Applicants respectfully disagree.

Again, Rekieta does disclose providing variable pairs of SCPs for storing records of a subscriber database, where the SCPs of a pair are redundant and the number of pairs of SCP increase to account for an increase in the number of records. However, Rekieta does not teach or suggest any identification based on a match between data used by any SCP of a pair of SCPs, any pair of SCPs, or any other element (used to generate second switch commands) and a first executable switch command (generated by a SCP, pair of SCPs or any other element), similar to that rectied by independent Claim 55. Further, Rekieta does not teach or suggest any step of identifying any executable switch command as being coded by data used by a SCP or pair of SCPs to generate a second switch command, also similar to that recited by independent Claim 55, again noting that the data synchronized between mate SCPs or migrated from one pair of SCPs to another are customer records, and not switch commands.

Applicants therefore respectfully submit that neither Cornell nor Rekieta, taken individually or in combination, teach or suggest at least the comparing or identifying steps of independent Claim 55. Thus, Applicants respectfully submit that independent Claim 55, and by dependency Claims 56-58, are patentably distinct from Cornell and Rekieta, taken individually

or in combination. Applicants also respectfully submit that independent Claims 59 and 63 recite subject matter similar to that of independent Claim 55, including the aforementioned comparing and identifying features. Accordingly, Applicants also respectfully submit that independent Claims 59 and 63, and by dependency Claims 60-62 and 64-66, are also patentably distinct from Cornell and Rekieta, taken individually or in combination, for at least the reasons given above with respect to independent Claim 55.

For at least the foregoing reasons, Applicants respectfully submit that the rejection of Claims 55-66 under 35 U.S.C. § 103(a) as being unpatentable over Cornell in view of Rekieta is overcome.

CONCLUSION

In view of the terminal disclaimer and the remarks presented above, Applicants respectfully submit that the present application is in condition for allowance. As such, the issuance of a Notice of Allowance is therefore respectfully requested. In order to expedite the examination of the present application, the Examiner is encouraged to contact Applicants' undersigned attorney in order to resolve any remaining issues.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

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